

**REMARKS**

**STATUS OF THE CLAIMS**

In accordance with the foregoing, claims 1-34 have been amended. Claims 1-38 are pending and under consideration.

No new matter is being presented, and reconsideration of the pending claims is respectfully requested.

**REJECTIONS OF CLAIMS 3, 5, 12, 15, 17-27 AND 29 UNDER 35 U.S.C. §102(e) AS BEING ANTICIPATED BY HIND ET AL. (U.S. PATENT NO. 6,635,088)**

The rejections of claims 3, 5, 12, 15, 17-27 and 29 are respectfully traversed and reconsideration is requested.

Hind et al. (hereinafter "Hind") relates to a method and system for reducing XML and DTD document file sizes using tags, where the size of tags wherein either or both of XML and DTD files is reduced.

In the portions of Hind cited by the Examiner, a tag compression technique is discussed that successively generates short names (for example, A, B, C, D, ...) for original tag names appearing in a document file, substitutes the short names for the original tag names, and retains relationships between the original tag names and the short names in a table (tag dictionary). According to this tag compression technique, it is necessary to determine whether or not the original tag name is held in the table, thereafter, relate the original tag name to a short name and enter them in the table when the original tag name is not held in the table. It is also necessary, at the time of decompression, to retrieve the short name in the table, and read an original tag name corresponding to the short name. Additionally, a different character is assigned, as a short name, to a different original tag.

On the other hand, embodiments of the present invention are directed to a plurality of structured documents having a common data structure. Stated another way, a tag list according to embodiments of the present invention, is obtained by extracting a common document structure (e.g., tag structure) of a plurality of structured documents having a common data structure, where element contents are removed from a structured document to be processed. Thus, only start tags and end tags remain (see page 32, lines 5-12, of the present application specification). The tag list holds information about a position where the tag is arranged as well as the tag name, by holding tags in the order in which the tags appear. (See, for example, Figs. 3B and 6B of the present application).

According to embodiments of the present invention, it is only necessary to replace all tags with the same delimiting code at the time of compression, which largely facilitates the compression. At the time of decompression of a compressed document, it is possible to decompress a compressed document quite easily by directly relating positions of the delimiting code, and the order in which the tags appear in the tag list, as opposed to retrieving a short name (delimiting code) in the compressed document, as taught by Hind. According to embodiments of the present invention, a delimiting code substituted for a start tag or an end tag is the same, regardless of what the tag name is. In contrast to Hind, embodiments of the present invention do not generate and assign a different delimiting code to a different tag name.

Independent claim 3, for example, as amended, is directed to compressing a plurality of structured documents having a common data structure. (See page 32, lines 5-12, of the present application specification for support). Therefore, for the reasons set forth above, it is respectfully submitted that a "tag list", as recited in amended independent claim 3, for example, is patentably distinguishable from a "table ", as disclosed by Hind.

Thus, it is further submitted that amended independent claim 3 patentably distinguishes over the prior art. The other pending independent claims are amended herein to recite similar features to amended independent claim 3 and, therefore, it is respectfully submitted that they, along with the claims depending therefrom, patentably distinguish over the prior art for at least the reasons set forth above.

#### REJECTIONS OF CLAIMS 1-2, 4, 6, 1, 13-14, 16, 28 AND 30 UNDER 35 U.S.C. §103(a) AS BEING UNPATENTABLE OVER HIND

Independent claim 1, for example, is amended herein to recite obtaining a single tag list, common to said plural structured documents, that lists start markup tags and end markup tags in the order that they appear in the structured documents, by removing element contents from the common data structure. Similarly, amended independent claim 4 recites extracting a plurality of subdocuments having a common data structure.

The remaining pending independent claims, as amended herein, recite similar features to independent claims 1 and 4. Thus, for at least the reasons provided herein, it is respectfully submitted that the amended independent claims, as well as the pending depending claims, patentably distinguish over Hind.

REJECTIONS OF CLAIMS 7-10 UNDER 35 U.S.C. §103(a) AS BEING UNPATENTABLE OVER HIND IN VIEW OF MOTUYAMA ET AL. (U.S. PATENT NO. 5,504,891) AND FURTHER IN VIEW OF GOODMAN (U.S. PATENT NO. 5,999,929)

Dependent claims 7-10 inherit the patentability of their independent base claim and, thus, it is respectfully submitted that claims 7-10 patentably distinguish over Hind.

Motuyama et al. and Goodman are merely cited as disclosing a list to hold tags and providing missing tags in structured documents. Thus, it is further submitted that Motuyama et al. and Goodman fail to cure the deviancies of Hind.

REJECTIONS OF CLAIMS 31-32 AND 35-36 UNDER 35 U.S.C. §103(a) AS BEING UNPATENTABLE OVER HIND IN VIEW OF MOREL ET AL. (U.S. PATENT NO. 5,572,731)

Dependent claims 31-32 and 35-36 inherit the patentability of their independent base claim and, thus, it is respectfully submitted that claims 31-32 and 35-36 patentably distinguish over Hind.

Morel et al. is merely cited as disclosing a tag list managing unit managing correspondence between compressed documents generated by said structured document compressing apparatus and said tag lists held in said tag-list-group holding unit. Thus, it is further submitted that Morel et al. fails to cure the deviancies of Hind.

REJECTIONS OF CLAIMS 33-34 AND 37-38 UNDER 35 U.S.C. §103(a) AS BEING UNPATENTABLE OVER HIND IN VIEW OF TUNIMAN ET AL. (U.S. PATENT NO. 6,507,874)

Dependent claims 33-34 and 37-38 inherit the patentability of their independent base claim and, thus, it is respectfully submitted that claims 33-34 and 37-38 patentably distinguish over Hind.

Tuniman et al. is merely cited as disclosing a tag-list identification information adding unit adding tag-list identification information, which identifies a tag list that corresponds to a compressed document generated by said structured document compressing apparatus, to said compressed document. Thus, it is further submitted that Tuniman et al. fails to cure the deviancies of Hind.

CONCLUSION

In accordance with the foregoing, it is respectfully submitted that all outstanding objections and rejections have been overcome and/or rendered moot. There being no further outstanding objections or rejections, it is submitted that the application is in condition for

allowance.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: September 11, 2006

By: Michael P. Stanley  
Michael P. Stanley  
Registration No. 58,523

1201 New York Ave, N.W., 7<sup>th</sup> Floor  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501